Case:24-00015-ESL Doc#:55 Filed:12/01/24 Entered:12/01/24 19:16:30 Desc: Main Document Page 1 of 2

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

* CASE NO. 23-03241-ESL

* CHAPTER 7

* Debtor,

* Adv. Proc. No. 24-00015-ESL

EARL GEERTGENS AND

TAMA GEERTGENS

* Plaintiffs,

vs.

* RIC F. MALIK,

Defendants.

* Defendants.

MOTION FOR ADDITIONAL EXTENSION OF TIME

TO THE HONORABLE ENRIQUE S. LAMOUTTE, US BANKRUPTCY JUDGE:

NOW COMES, debtor-defendant, through his undersigned attorney and respectfully state(s) as follows:

- 1. The undersigned counsel needs additional time to adequately investigate plaintiffs' MOTION TO STRIKE OR DISMISS DEBTOR'S AMENDED ANSWER WITH COUNTERCLAIMS PURSUANT TO FED.R.BANKR.P. 7012(B) [51] and file an opposition.
- 2. The undersigned counsel is starting Monday December 2, 2024, tomorrow, the first part of a murder criminal jury trial in Mayaguez which is scheduled to last until December 12, 2024, the second part in January 2025.
- 3. The undersigned counsel will be staying in the west side of

Case:24-00015-ESL Doc#:55 Filed:12/01/24 Entered:12/01/24 19:16:30 Desc: Main Document Page 2 of 2

the island for the duration of the trial

4. Defendant requests the time be additionally extended after December 12, 2024, by fourteen (14) days, so that once the investigation is complete defendant can meet with the undersigned counsel and discuss the steps to follow in the above referenced case.

WHEREFORE, debtor-defendant respectfully requests through his undersigned attorney that for the above stated reasons this this Honorable Court grant the requested additional extension of time, along with such other relief that this court deems just and proper.

Respectfully submitted, in Carolina, Puerto Rico this $1^{\rm st}$ day of December 2024.

CERTIFICATE OF SERVICE, P.R. LBR 9013-3

I hereby certify that on this day, I electronically filed the foregoing with the Clerk of the Court uploading the same using the CM/ECF System which will send notification of such filing to all parties of record registered in the use of the CM/ECF system.

FREDERIC CHARDON DUBOS LAW OFFICE

s/Frederic Chardon Dubos
Frederic Chardon Dubos, Esq.
USDC-PR 201601
P.O. Box 1797
Carolina, Puerto Rico, 00984-1797
Tel. (787) 908-2476
Email fcdlaw2025@outlook.com
Attorney(s) for Debtor-Defendant